

EXHIBIT A

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF BRONX

Index No.: _____

Purchased: _____

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VILMA INTERIANO,

Plaintiff designates BRONX
County as the place for trial.

Plaintiff,

SUMMONS

-against-

The basis of venue is
plaintiff's residence.

CROTHALL FACILITIES MANAGEMENT, INC. and
CROTHALL HEALTHCARE, INC.,

Plaintiff's Address:

Defendants.


209 East 165th St. Apt. 4E
Bronx, NY 10456

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To the above-named defendant(s):

YOU ARE HEREBY SUMMONED to answer the complaint in this action and to serve a copy of your answer, or, if the complaint is not served with this summons, to serve a notice of appearance, on the plaintiff's attorney within twenty (20) days after the service of this Summons, exclusively of the day of service (or within thirty [30] days after service is complete if this summons is not personally delivered to you within the State of New York); and in case of your failure to appear or answer, judgment will be taken against you by default for the relief demanded in the complaint.

Dated: New York, New York
May 27, 2020

Yours, etc.



Marc C. DeSalvo, Esq.

LAW OFFICES OF MARC C. DESALVO, P.C.

Attorney for Plaintiff

VILMA INTERIANO

358 Fifth Avenue, Suite 1406

New York, New York 10001

(212) 560-9790 Phone

(212) 560-9570 Fax

marcdesalvoesq@gmail.com

******Upon receipt of this Summons and Verified Complaint, please forward to your corporate office and/or insurance carrier for further instructions.******

Defendant's Address:

Via Secretary of State:

Crothall Facilities Management, Inc.
1500 Liberty Ridge Drive, Suite 210
Wayne, PA 19087

Via Secretary of State:

Crothall Healthcare, Inc.
1500 Liberty Ridge Drive, Suite 210
Wayne, PA 19087

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF BRONX

-----X Index No.: _____
VILMA INTERIANO,

Plaintiff,

VERIFIED COMPLAINT

-against-

CROTHALL FACILITIES MANAGEMENT, INC. and
CROTHALL HEALTHCARE, INC.,

Defendants.

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Plaintiff, VILMA INTERIANO, by her attorney, LAW OFFICE OF MARC C.

DESALVO, P.C., complaining of the defendants, respectfully alleges upon information and
belief, as follows:

AS AND FOR A FIRST CAUSE OF ACTION AGAINST
CROTHALL FACILITIES MANAGEMENT, INC.

1. Plaintiff, VILMA INTERIANO, was and still is a resident of the County of
Bronx, City and State of New York.

2. Defendant, CROTHALL FACILITIES MANAGEMENT, INC., was and still is a
foreign business company, organized and existing under and by virtue of the laws of the State of
New York.

3. That on or about January 17, 2018, and for a considerable amount of time prior
thereto, defendant, CROTHALL FACILITIES MANAGEMENT, INC., was contracted to
maintain the premises located at 234 East 149th Street, County of Bronx, City and State of New
York.

4. That on or about January 17, 2018, and for a considerable amount of time prior thereto, defendant, CROTHALL FACILITIES MANAGEMENT, INC., was contracted to clean the premises located at 234 East 149th Street, County of Bronx, City and State of New York.

5. Defendant, CROTHALL FACILITIES MANAGEMENT, INC., their agents, servants and/or employees operated the aforesaid premises.

6. Defendant, CROTHALL FACILITIES MANAGEMENT, INC., their agents, servants and/or employees managed the aforesaid premises.

7. Defendant, CROTHALL FACILITIES MANAGEMENT, INC., their agents, servants and/or employees controlled the aforesaid premises.

8. Defendant, CROTHALL FACILITIES MANAGEMENT, INC., their agents, servants and/or employees supervised the aforesaid premises.

9. Defendant, CROTHALL FACILITIES MANAGEMENT, INC., their agents, servants and/or employees repaired the aforesaid premises.

10. Defendant, CROTHALL FACILITIES MANAGEMENT, INC., their agents, servants and/or employees maintained the aforesaid premises.

11. Defendant, CROTHALL FACILITIES MANAGEMENT, INC., their agents, servants and/or employees inspected the aforesaid premises.

12. Defendant, CROTHALL FACILITIES MANAGEMENT, INC., their agents, servants and/or employees leased the aforesaid premises.

13. Defendant, CROTHALL FACILITIES MANAGEMENT, INC., their agents, servants and/or employees operated, managed, controlled, supervised, repaired, maintained and inspected the aforesaid premises.

14. Defendant, CROTHALL FACILITIES MANAGEMENT, INC., their agents, servants and/or employees operated, managed, controlled, supervised, repaired, maintained and inspected the aforesaid premises in an unsafe, hazardous and dangerous condition.

15. Defendant, CROTHALL FACILITIES MANAGEMENT, INC., their agents, servants and/or employees operated, managed, controlled, supervised, repaired, maintained and inspected the aforesaid premises in a trap like condition.

16. On or about January 17, 2018, the plaintiff, VILMA INTERIANO, was lawfully traversing within the aforesaid location, more specifically the second floor, and was caused to slip and fall and sustain personal injuries.

17. Plaintiff, VILMA INTERIANO, was injured.

18. Plaintiff, VILMA INTERIANO, was seriously injured.

19. The aforesaid occurrence and resulting injuries to plaintiff were due to the careless, reckless and the negligent conduct of defendant CROTHALL FACILITIES MANAGEMENT, INC.

20. That the premises, herein and the parts thereof constituted a public and private nuisance and a trap for the unaware and more particularly the plaintiff herein.

21. That the premises herein and the parts thereof constituted an absolute nuisance and a trap for the unaware and more particularly the plaintiff herein.

22. By reason of the foregoing, the plaintiff has been damaged in an amount exceeding the jurisdictional limits of all lower Courts, which would otherwise have jurisdiction.

AS AND FOR A SECOND CAUSE OF ACTION AGAINST
CROTHALL HEALTHCARE, INC.

23. Plaintiff, VILMA INTERIANO, repeats reiterated and realleges each and every allegation of the complaint in paragraphs numbered “1” through “22”, with the same force and effect as though each and every allegation were set forth herein at length herein.

24. Defendant, CROTHALL HEALTHCARE, INC., was and still is a foreign business company, organized and existing under and by virtue of the laws of the State of New York.

25. That on or about January 17, 2018, and for a considerable amount of time prior thereto, defendant, CROTHALL HEALTHCARE, INC., was contracted to maintain the premises located at 234 East 149th Street, County of Bronx, City and State of New York.

26. That on or about January 17, 2018, and for a considerable amount of time prior thereto, defendant, CROTHALL HEALTHCARE, INC., was contracted to clean the premises located at 234 East 149th Street, County of Bronx, City and State of New York.

27. Defendant, CROTHALL HEALTHCARE, INC., their agents, servants and/or employees operated the aforesaid premises.

28. Defendant, CROTHALL HEALTHCARE, INC., their agents, servants and/or employees managed the aforesaid premises.

29. Defendant, CROTHALL HEALTHCARE, INC., their agents, servants and/or employees controlled the aforesaid premises.

30. Defendant, CROTHALL HEALTHCARE, INC., their agents, servants and/or employees supervised the aforesaid premises.

31. Defendant, CROTHALL HEALTHCARE, INC., their agents, servants and/or employees repaired the aforesaid premises.

32. Defendant, CROTHALL HEALTHCARE, INC., their agents, servants and/or employees maintained the aforesaid premises.

33. Defendant, CROTHALL HEALTHCARE, INC., their agents, servants and/or employees inspected the aforesaid premises.

34. Defendant, CROTHALL FACILITIES MANAGEMENT, INC., their agents, servants and/or employees leased the aforesaid premises.

35. Defendant, CROTHALL HEALTHCARE, INC., their agents, servants and/or employees operated, managed, controlled, supervised, repaired, maintained and inspected the aforesaid premises.

36. Defendant, CROTHALL HEALTHCARE, INC., their agents, servants and/or employees operated, managed, controlled, supervised, repaired, maintained and inspected the aforesaid premises in an unsafe, hazardous and dangerous condition.

37. Defendant, CROTHALL HEALTHCARE, INC., their agents, servants and/or employees operated, managed, controlled, supervised, repaired, maintained and inspected the aforesaid premises in a trap like condition.

38. On or about January 17, 2018, the plaintiff, VILMA INTERIANO, was lawfully traversing within the aforesaid location, more specifically the second floor, and was caused to slip and fall and sustain personal injuries.

39. Plaintiff, VILMA INTERIANO, was injured.

40. Plaintiff, VILMA INTERIANO, was seriously injured.

41. The aforesaid occurrence and resulting injuries to plaintiff were due to the careless, reckless and the negligent conduct of defendant CROTHALL HEALTHCARE, INC.

42. That the premises, herein and the parts thereof constituted a public and private nuisance and a trap for the unaware and more particularly the plaintiff herein.

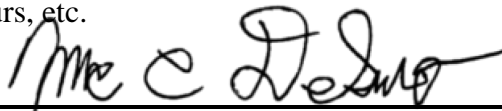
43. That the premises herein and the parts thereof constituted an absolute nuisance and a trap for the unaware and more particularly the plaintiff herein.

44. By reason of the foregoing, the plaintiff has been damaged in an amount exceeding the jurisdictional limits of all lower Courts, which would otherwise have jurisdiction.

WHEREFORE, plaintiff demands judgment against the defendants in an amount, which exceeds the limits of all lower courts, which would otherwise have jurisdiction, together with the costs and disbursements of this action.

Dated: New York, New York
May 27, 2020

Yours, etc.



Marc C. DeSalvo, Esq.

LAW OFFICE OF MARC C. DESALVO, P.C.

Attorney for Plaintiff(s)

VILMA INTERIANO

358 Fifth Avenue, Suite 1406

New York, New York 10001

(212) 560-9790

marcdesalvoesq@gmail.com

ATTORNEY VERIFICATION

I, the undersigned, an attorney admitted to practice in the Courts of New York, affirm the following to be true: That I am the attorney for the plaintiff, VILMA INTERIANO, in the within action; that I have read the within Verified Complaint and know the contents thereof, and that the same is true to my knowledge, except as to the matters herein stated to be alleged upon information and belief, and that as to these matters I believe them to be true. That the sources of my information and knowledge are records and investigation reports maintained within the file.

That the reason this verification is made by affirmant and not by the plaintiff is that the plaintiff is not within the County of New York, which is the county where I have my office.

Dated: New York, New York
May 27, 2020



Marc C. DeSalvo